

Exhibit 3

to February 6, 2025 Letter to the Honorable Julien X. Neals, U.S.D.J.
Jennifer Michaels, M.D. v. Rutgers, the State University of New Jersey, et al.
Civil Action No.: 2:15-cv-07603-JXN-CLW

From: Aversa, Robyn L. (Berkeley Heights) Robyn.Aversa@jacksonlewis.com 

Subject: RE: Michaels v. Rutgers

Date: February 6, 2025 at 4:46 PM

To: Neil Cartusciello ncartusciello@cklawllc.com, Bennett, John K. (Berkeley Heights) John.Bennett@jacksonlewis.com, Posluszny, Linda J. (Berkeley Heights) Linda.Posluszny@jacksonlewis.com

Cc: Cesario, Millie (Berkeley Heights) Millie.Cesario@jacksonlewis.com

RA

Hi Neil, we have conferred with our client. We cannot consent to any extension at this late stage.

Judge Neals' Opinion and Order affording Dr. Michaels the opportunity to meet, confer and provide the Court with a mutually-agreed alternative to the "Exhibit 5" Settlement Agreement within 45 days was issued on December 26, 2024. You did not even attempt to initiate any such meet-and-confer until January 31, 2025, 35 days into that 45-day period. Instead, you filed a reconsideration motion challenging Judge Neals' Opinion and Order. Rutgers was required to spend more time and money opposing that meritless reconsideration motion in this settled case.

Further, your belated proposals for re-writing the terms of the Confidentiality and No-Rehire provisions of the Settlement Agreement do not suggest that mutual agreement would be reached if there were an extension of time.

In the event you do request an extension without our consent, we would expect that you would inform the Court of our reasons for not consenting, as stated here.

Please also be advised that as of Monday, February 10, 2025, the end of the 45-day period. we will be asking the Court to "enter an Order establishing Exhibit 5 as the terms of settlement," as per the Court's Order filed December 26, 2024.

Robyn

**Robyn L. Aversa**

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From: Neil Cartusciello <ncartusciello@cklawllc.com>**Sent:** Thursday, February 6, 2025 2:09 PM**To:** Bennett, John K. (Berkeley Heights) <John.Bennett@jacksonlewis.com>; Aversa, Robyn L. (Berkeley Heights) <Robyn.Aversa@jacksonlewis.com>; Posluszny, Linda J. (Berkeley Heights) <Linda.Posluszny@jacksonlewis.com>**Subject:** Michaels v. Rutgers

Dear John, Robyn, and Linda:

I would like to ask Judge Neals to extend to February 28th the 45-day deadline in the Order he entered on December 26 so that we can continue to discuss possible alternative wording of the confidentiality and “no rehire” provisions.

Please let me know if you will consent to that request.

Thank you.

- Neil

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